REMARKS

Claims 1-28 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 102(b) Rejection:

The Examiner rejected claims 1-7, 10-13 and 15-28 under 35 U.S.C. § 102(b) as being anticipated by Granade et al. (U.S. Publication 2002/0103881) (hereinafter "Granade"). Applicants respectfully traverse this rejection for at least the reasons below.

Granade fails to teach or suggest interception logic configured to intercept a plurality of method calls to the application component, **wherein the interception logic is configured to invoke the localization logic in response to one or more of the plurality of method calls**, and the localization logic being configured to translate input parameters or return values between the system default locale and another locale, in combination with the remaining features of claim 1.

In paragraphs 0036 through 0038, Granade discloses a localization component:

> Localization component 210 uses location based services and locale information to customize features of an application in backend systems 102. Location based services locates a mobile device using technologies such as Global Positioning Systems (GPS). This information is provided applications in backend systems 102 to tailor information to a users geographic position. For example, a person accessing a CRM system with a mobile device can use location-based information to request a list of customers within a given distance from the person's location.
>
> Locale information provided to the application by localization component 210 specifies how to tailor information for a particular country, region or culture. In many applications a locale variable causes the application to generate information in a preferred language, currency, date/time format and other information peculiar to the geographic or cultural region. In one implementation, localization component 210 acts as a proxy for mobile devices 106 and selects a locale variable in the application for generating information. Information generated by the one

or more applications in backend systems 102 correlates to the selected locale and appears on mobile devices 106 in the correct format or language.

If the application in backend systems 102 does not offer multiple locales, an alternate implementation of the present invention translates information generated by the application into the locale selected for use on mobile devices 106. For example, this may include automatically translating the default language in the application into the language associated with the desired locale. This latter implementation may also automatically perform currency translations between a default currency used by the application and the currency in the desired locale.

In paragraph 0042, Granade discloses an integration manager that intercepts requests for applications:

Integration manager 202 tracks specific applications available in backend systems 102 and the corresponding methods registered for accessing these systems stored in application repository 116. Integration manager 202 intercepts requests for applications in backend systems 102 while an appropriate method or methods are identified for execution. Integration manager 202 receives requests in an intermediary language such as XML and then invokes a method in a language or format appropriate for the particular application on backend systems 102. In certain cases, integration manager 202 can also be used to ensures proper XML code is generated and used during data processing. Languages, interface protocols and syntaxes supported by integration manager 202 are compatible with XML, SQL, HTML, LDAP, CORBA, COM, and IIOP. For example, integration manager can be implemented using a hash table that maps applications and functions offered by the applications to specific methods developed in the appropriate language and interface protocol. Accordingly, a Microsoft application like Outlook may be accessed using a method written in COM while an object-oriented CRM application written in Java may be accessed using CORBA compatible methods.

Clearly, there is no teaching or suggestion in Granade that the integration manager 202 is configured to invoke the localization component 210. There is also clearly no teaching or suggestion in Granade that the integration manager 202 is configured to invoke any other component to translate input parameters or return values between the system default locale and another locale. Although Granade's integration manager invokes a method "in a language or format appropriate for the

particular application," this language or format is one of several **software-related languages and standards** (e.g., "languages, interface protocols and syntaxes ... compatible with XML, SQL, HTML, LDAP, CORBA, COM, and IIOP"). Thus, the software language or format of Granade's integration manager is not related to the "language associated with the desired locale" of Granade's localization component. Furthermore, Applicants can find no teaching or suggestion in Granade that the localization component 210 is invoked by interception logic **in response to** one or more of a plurality of method calls to an application component.

In the "Response to Arguments" section of the Final Office Action, the Examiner cites paragraphs 0050 and 0063 of Granade, in addition to paragraph 0042 discussed above, in support of the rejection of claim 1. In paragraph 0050, Granade discloses the creation of methods for accessing applications through an appropriate application programming interface or a native programming language used in the application. The methods are stored in a table, and the integration manager 202 is used to invoke the methods and pass the results to mobile devices in a compatible software language or format. In paragraph 0063, Granade again discloses that the integration manager 202 invokes methods to access applications (e.g., by transforming XML-compatible information into an appropriate software language or format as described in paragraph 0066). As previously discussed, Granade's integration manager 202 is configured to translate between software languages or formats, **not** to translate input parameters or return values **between the system default locale and another locale**. Localization functions in Granade are performed by the localization component 210. However, Granade's integration manager 202 is **not** configured to **invoke localization logic** and an application component in response to one or more of a plurality of method calls.

Applicants remind the Examiner that anticipation requires the presence in a single prior art reference disclosure of each and every limitation of the claimed invention, arranged as in the claim. M.P.E.P 2131; *Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co.*, 221 USPQ 481, 485 (Fed. Cir. 1984). The **identical invention must** be shown in as complete detail as is contained in the claims. *Richardson v. Suzuki*

Motor Co., 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). As discussed above, Granade fails to disclose each and every limitation of claim 1, such as interception logic configured to intercept a plurality of method calls to the application component, wherein the interception logic is configured to invoke the localization logic in response to one or more of the plurality of method calls, in combination with the remaining features of claim 1. Therefore, Granade clearly cannot be said to anticipate claim 1.

Regarding claim 11, Granade fails to teach or suggest a method comprising creating a dynamic proxy for an application component comprising one or more localizable parameters or return values, in combination with the remaining features of claim 11. Again, Granade discloses (e.g., in paragraphs 0060 and 0061) executing an application to generate data, converting the data to a target format, and rendering the data on a mobile device. However, Applicants can find no teaching or suggestion in Granade for any method comprising creating a dynamic proxy for an application component. For reasons similar to those discussed above with respect to claim 1, Granade fails to teach or suggest a method comprising modifying a service locator to return an interface to the proxy or the dynamic proxy invoking localization logic, separate from application logic, to translate localizable parameters or return values between a system default locale to another locale.

In the "Response to Arguments" section of the Final Office Action, the Examiner cites paragraph 0042 of Granade in support of the rejection of claim 11. Specifically, the Examiner asserts that Java and CORBA are used in Granade "to dynamically generate proxies." Applicant can find no such teaching or suggestion in Granade. In paragraph 0042, for example, Granade discloses that the integration manager may access a Microsoft application using a method written in COM and may access a Java application using CORBA methods. Applicant submits that accessing an application using a compatible computer language or interface is not equivalent to creating a dynamic proxy for an application component. Although the Examiner also cites paragraph 0036 of Granade in support of the rejection of claim 11, Applicant can find no teaching or

suggestion in paragraph 0036 for modifying a service locator to return an interface to the proxy.

Regarding claim 12, Granade fails to teach or suggest a method comprising determining whether input parameters or return values associated with the method call are localizable, in combination with the remaining features of claim 12. At locations such as paragraphs 0063 through 0065, Granade discloses techniques for delivering information from a mobile device to a backend system (including an application). The information sent to the application is enhanced with application services including localization services. However, Applicants can find no teaching or suggestion in Granade for determining whether input parameters or return values associated with the method call are localizable. By disclosing in paragraph 0038 that localization services are automatically performed, rather than by determining whether input parameters or return values associated with the method call are localizable, Granade appears to teach away from claim 12.

In the "Response to Arguments" section of the Final Office Action, the Examiner cites paragraphs 0036-0038 of Granade in support of the rejection of claim 12. Specifically, the Examiner asserts that Granade teaches "a default process if information obtained from the mobile device is not localizable." Again, Applicant can find no such teaching or suggestion in Granade. In paragraphs 0036-0038, for example, Granade generally discloses synchronization and localization functions but does not teach or suggest determining whether input parameters or return values associated with the method call are localizable.

Thus, for at least the reasons above, the rejection of independent claims 1, 11, and 12 is not supported by the cited art, and removal thereof is respectfully requested. Similar remarks also apply to independent claims 20 and 21.

Applicant also asserts that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be

unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

Section 103(a) Rejections:

The Examiner rejected claims 8 and 14 under 35 U.S.C. § 103(a) as being unpatentable over Granade in view of Upton (U.S. Publication 2003/0110315). The Examiner rejected claim 9 under 35 U.S.C. § 103(a) as being unpatentable over Granade in view of Graham et al. (U.S. Publication 2002/0046240) (hereinafter "Graham"). Applicants respectfully traverse these rejections. However, since the rejections have been shown to be unsupported for the independent claims, a further discussion of the dependent claims 8, 9 and 14 is not necessary at this time.

CONCLUSION

Applicants respectfully submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-64700/RCK.

Respectfully submitted,

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